## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA Charlottesville Division

NICOLE P. ERAMO	)
Plaintiff	) Case No. 3:15-cv-00023-GEC
v.	)
ROLLING STONE LLC,	)
SABRINA RUBIN ERDELY, and	)
WENNER MEDIA LLC,	) )
Defendants.	)

## PLAINTIFF'S TRIAL WITNESS LIST

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Joint Second Amended Scheduling Order dated February 18, 2016, Plaintiff provides the following names of witnesses that she intends to call at the trial of this matter.

Plaintiff intends to call the following live witnesses:

- 1. Nicole Eramo
- 2. Sabrina Rubin Erdely
- 3. Elisabeth Garber-Paul
- 4. Sara Surface
- 5. "Jackie"
- 6. Alexandria Pinkleton
- 7. Brian Head
- 8. Stephen Scipione
- 9. Detective Jacob Via
- 10. Officer Benjamin Rexrode
- 11. Kathryn Hendley

- 12. Sean Woods
- 13. Victoria Groves
- 14. Laurie Casteen
- 15 Allen Groves
- 16. Dr. Kant Lin
- 17. Kirt Von Daacke

Plaintiff intends to present the testimony of the following witnesses by deposition designations:

- 1. Emily Renda (*See* Plaintiff's Disclosure of Deposition Designations for Emily Renda, attached hereto as Exhibit A)
- 2. Ryan Duffin (See Plaintiff's Disclosure of Deposition Designations for Ryan Duffin, attached hereto as Exhibit B)
- 3. John Ritter (*See* Plaintiff's Disclosure of Deposition Designations for John Ritter, attached hereto as Exhibit C)
- 4. William Dana (*See* Plaintiff's Disclosure of Deposition Designations for William Dana, attached hereto as Exhibit D)
- 5. Jann Wenner (See Plaintiff's Disclosure of Deposition Designations for Jann Wenner, attached hereto as Exhibit E)
- 6. Allen Groves (*See* Plaintiff's Disclosure of Deposition Designations for Allen Groves, attached hereto as Exhibit F)
- 7. Patricia Lampkin (See Plaintiff's Disclosure of Deposition Designations for Patricia Lampkin, attached hereto as Exhibit G)
- 8. Alvin Ling (*See* Plaintiff's Disclosure of Deposition Designations for Alvin Ling, attached hereto as Exhibit H)
- 9. Michael Provus (See Plaintiff's Disclosure of Deposition Designations for Michael Provus, attached hereto as Exhibit I)
- 10. Sabrina Rubin Erdely (*See* Plaintiff's Disclosure of Deposition Designations for Sabrina Rubin Erdely, attached hereto as Exhibit J)
- 11. Sean Woods (*See* Plaintiff's Disclosure of Deposition Designations for Sean Woods, attached hereto as Exhibit K)

- 12. "Jackie" (See Plaintiff's Disclosure of Deposition Designations for "Jackie," attached hereto as Exhibit L)<sup>1</sup>
- 13. Sara Surface (See Plaintiff's Disclosure of Deposition Designations for Sara Surface, attached hereto as Exhibit M)<sup>2</sup>
- 14. Alexandria Pinkleton (*See* Plaintiff's Disclosure of Deposition Designations for Alexandria Pinkleton, attached hereto as Exhibit N)<sup>3</sup>

Plaintiff reserves the right to call any witness identified on Defendants' witness list, to call each witness in either or both of the liability and damages phases of the trial, to call custodians of records if needed to overcome any objection or secure admission of documentary evidence, and to amend this witness list to add additional witnesses that may become necessary, either for rebuttal or other purposes.

Dated: October 3, 2016 Respectfully submitted,

By: /s/ Elizabeth M. Locke

Thomas A. Clare (VA Bar No. 39299)

Elizabeth M. Locke (VA Bar No. 71784)

Andrew C. Phillips (VA Bar No. 88880)

Joseph R. Oliveri (VA Bar No. 77152)

CLARE LOCKE LLP

902 Prince Street

Alexandria, Virginia 22314

Telephone: (202) 628-7400

tom@clarelocke.com

libby@clarelocke.com

andy @ clarelocke.com

joe@clarelocke.com

Attorneys for Plaintiff Nicole P. Eramo

<sup>&</sup>lt;sup>1</sup> Plaintiff provides deposition designations for "Jackie" in the event that she is unavailable for trial.

<sup>&</sup>lt;sup>2</sup> Plaintiff provides deposition designations for Ms. Surface in the event that she is unavailable for trial.

<sup>&</sup>lt;sup>3</sup> Plaintiff provides deposition designations for Ms. Pinkleton in the event that she is unavailable for trial.

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Nicole Eramo's Trial Witness List was served on the below counsel of record on October 3, 2016 in accordance with the Federal Rules of Civil Procedure:

Michael John Finney, William David Paxton, and Scott Sexton GENTRY LOCKE RAKES & MOORE

P.O. Box 40013

Roanoke, VA 24022-0013 Telephone: (540) 983-9373 Telephone: (540) 983-9334

Fax: (540) 983-9400

Email: finney@gentrylocke.com Email: paxton@gentrylocke.com Email: sexton@gentrylocke.com

Elizabeth A. McNamara & Samuel M. Bayard DAVIS WRIGHT TREMAINE LLP 1251 Avenue of the Americas, 21st Floor New York, New York 10020

Telephone: (212) 489-8230 / Fax: (212) 489-8340

Email: lizmcnamara@dwt.com Email: samuelbayard@dwt.com

Alison B. Schary DAVIS WRIGHT TREMAINE LLP 1919 Pennsylvania Avenue NW, Suite 800 Washington, DC 20006-3401

Telephone: (202) 973-4248 / Fax: (202) 973-4448

Email: alisonschary@dwt.com

Attorneys for Defendants Rolling Stone LLC, Sabrina Rubin Erdely, and Wenner Media LLC

Benjamin Gaillard Chew MANATT, PHELPS & PHILLIPS, LLP 1050 Connecticut Avenue, NW, Suite 600 Washington, DC 20036-5303

Telephone: (202) 585-6511 Email: bchew@manatt.com

Attorney for Defendant Sabrina Rubin Erdely

Dated: October 3, 2016

By: /s/Elizabeth M. Locke

Elizabeth M. Locke